



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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BELLEAU TECHNOLOGIES, LLC,

18 Civ. 06319 (AJN)

Plaintiff,

v.

*[Signature]*  
**[PROPOSED] ORDER  
TO SHOW CAUSE**

JOEALLENPRO LIMITED, a foreign corporation;  
and JOE ALLEN, as an individual,

Defendants.

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Upon the Declaration of Jeremy Sadkin, dated July 17, 2018, and the accompanying exhibits; the Declaration of Eric Sadkin, dated July 17, 2018; the Affidavit of Nicole Mazanitis, dated July 17, 2018, and the accompanying exhibit; the Complaint herein; and the Memorandum of Law in Support of Plaintiff Belleau Technologies, LLC's ("Plaintiff") Motion for a Temporary Restraining Order and Preliminary Injunction, *and for the reasons stated on the record of the July 17, 2018, hearing* it is hereby:

ORDERED, that the defendants JoeAllenPro Limited and Joe Allen (collectively, "Defendants") show cause, before the Honorable Alison Nathan, at the United States Courthouse located at 40 Foley Square, New York, New York, Room 906, on July 31, 2018 at 10:00 a.m., or as soon thereafter as counsel may be heard, why an order should not be issued and entered pursuant to Federal Rule of Civil Procedure 65(a) and 35 U.S.C. §§ 271 and 283 during the pendency of this action:

- a) Enjoining Defendants Joe Allen and JoeAllenPro Limited, their employees, agents, subsidiaries, affiliates, parents, successors, assigns, officers, servants, attorneys, and any other person in active concert or participation with them, from any conduct that infringes, directly or indirectly, U.S. Patent No. 9,953,646,

including making, selling, distributing, marketing, testing, importing, offering to sell, or otherwise using a software product called “AutoPrompter” – or any other software application infringing U.S. Patent No. 9,953,646 – within the United States;

- b) Ordering that Defendants, their employees, agents, subsidiaries, affiliates, parents, successors, assigns, officers, servants, attorneys, and any other person in active concert or participation with them, immediately destroy any copies of the software product called “AutoPrompter” – or any other software application infringing U.S. Patent No. 9,953,646 – in their possession, custody, or control;
- c) Ordering that Defendants, their employees, agents, subsidiaries, affiliates, parents, successors, assigns, officers, servants, attorneys, and any other person in active concert or participation with them, turn over to the Court any proceeds that Defendants have received as a result of their sale of the software product called “AutoPrompter” – or any other software application infringing U.S. Patent No. 9,953,646; and
- d) Granting Plaintiff such other and further relief as this Court deems just and proper; and it is further

ORDERED that, sufficient reason having been shown therefor, pending the hearing ~~and determination~~ of Plaintiff’s application for a preliminary injunction, pursuant to Federal Rule of Civil Procedure 65(a) and 35 U.S.C. §§ 271 and 283, the Defendants and their employees, agents, subsidiaries, affiliates, parents, successors, assigns, officers, servants, attorneys, and any other person in active concert or participation with them, from any conduct that infringes, directly or indirectly, U.S. Patent No. 9,953,646, including making, selling,

distributing, marketing, testing, importing, offering to sell, or otherwise using a software product called "AutoPrompter" – or any other similarly infringing software application – within the United States; and it is further

*JS* ORDERED that security in the amount of \$ \_\_\_\_\_ be posted by the Plaintiff prior to \_\_\_\_\_, 2018 at \_\_\_\_\_ o'clock in the \_\_\_\_\_ noon of that day; and it is further

*filed with the Court and*

ORDERED that any written opposition by Defendants be served by electronic mail to [nmazanitis@curtis.com](mailto:nmazanitis@curtis.com), so as to be received by Plaintiff's counsel on or before 2pm EDT

*JS* on the 25<sup>th</sup> day of July, 2018; and it is further *ORDERED that any reply papers be filed with the Court and served on Defendants by 2pm EDT on July 27, 2018. Courtesy copies must*

ORDERED that service of a copy of (1) this Order and all supporting papers; and

(2) the Complaint and all supporting papers upon Defendants shall be effected by electronic mail to [joe@joeallenpro.com](mailto:joe@joeallenpro.com).

*Service of the summons and Complaint must also be made in accordance with Fed. R. Civ. P. 4.*

*A status conference will be conducted by Judge Nathan on Monday July 23, 2018, at 10:00 AM in Courtroom 906, 40 Foley Square, NY, NY 10007.*

DATED: New York, New York

ISSUED: July 17, 2018  
5:05 pm

*[Signature]*  
UNITED STATES DISTRICT JUDGE  
SOUTHERN DISTRICT OF NEW YORK